

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA**

JOHN DOE,

Plaintiff,

-against-

**THE BOARD OF REGENTS OF THE
UNIVERSITY SYSTEM OF GEORGIA,
GEORGE P. “BUD” PETERSON,
individually and as agent of the Georgia
Institute of Technology, PETER
PAQUETTE, individually and as agent of
the Georgia Institute of Technology,
JOHN M. STEIN, individually and as
agent of the Georgia Institute of
Technology, RETA PEKOWSKY, as
agent of the Georgia Institute of
Technology,**

Defendants.

Civil Action No:
1:15-CV-4354-RWS

Jury Trial Demand

**PLAINTIFF’S RESPONSE TO DEFENDANTS’ MOTION FOR
EXTENSION OF TIME TO FILE THEIR RESPONSE BRIEF TO MOTION
FOR PRELIMINARY INJUNCTION AND MOTION TO DISMISS**

Plaintiff respectfully opposes, in part, Defendants’ Motion for Extension of Time to File Their Response Brief to the Motion for Preliminary Injunction and Motion to Dismiss, showing the Court as follows:

1.

Defendants seek additional time to submit papers in opposition to Plaintiff's Motion for Preliminary Injunction and to answer or otherwise move in response to the Verified Complaint.

2.

Plaintiff has no objection to extending the Defendants' time to respond to the Verified Complaint.

3.

Under typical circumstances, Plaintiff would likewise have no objection to the other extension requested by Defendants.

4.

However, with the tight constraints present here, Plaintiff formally objects to the Motion for additional time to respond to his Motion for Preliminary Injunction.

5.

All but one Defendant were served with the Verified Complaint and Motion for Preliminary Injunction on December 17, 2015 and have thus had sufficient time to prepare their response.

6.

While Plaintiff does not intend to burden the Court with unnecessary papers, to the extent a Reply is warranted, Plaintiff's ability to prepare his Reply and submit it in advance of the hearing scheduled for January 7 will be rendered moot if the Defendants are allowed to file their opposition on January 4, 2016.

7.

For these reasons, Plaintiff respectfully opposes Defendants' Motion to extend the deadline in which to respond to Plaintiff's Motion for Preliminary Injunction.

Respectfully submitted this 30th day of December, 2015.

/s/ Jonathan E. Hawkins

Jonathan E. Hawkins

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-and-

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Attorneys for Plaintiff John Doe

CERTIFICATION UNDER L.R. 7.1D.

Pursuant to Northern District of Georgia Civil Local Rule 7.1D, the undersigned counsel certifies that this is a computer document and was prepared in Times New Roman 14 point font, as mandated in Local Rule 5.1C.

This 30th day of December, 2015.

/s/ Jonathan E. Hawkins

Jonathan E. Hawkins

Georgia Bar No. 338779

CERTIFICATE OF SERVICE

This is to certify that I this day served a copy of the foregoing upon all counsel of record by electronically mailing to the Clerk of Court using the CM/ECF System which will automatically send an email notification of such filing to the following attorney of record:

Devon Orland
Office of the Attorney General
40 Capitol Square
Atlanta, GA 30334-1300
dorland@law.ga.gov

This 30th day of December, 2015.

Respectfully submitted,

/s/ Jonathan E. Hawkins
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